

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LOUIS ROBINSON,

Plaintiff,

vs.

REYNALDO GUEVARA *et al.*,

Defendants.

Case No. 1:24-cv-05954

Hon. Franklin U. Valderrama

**UNOPPOSED MOTION FOR ENTRY OF A
CONFIDENTIALITY AND PROTECTIVE ORDER**

Plaintiff Louis Robinson moves under Fed. R. Civ. P. 26(c) for entry of a confidentiality and protective order. In support, he states:

1. Plaintiff sued the City of Chicago, Reynaldo Guevara, and other individual police officers under 42 U.S.C. § 1983, alleging that they framed him for a murder he did not commit. ECF No. 1.

2. This case is one of several involving Defendant Guevara and the City of Chicago.

3. These cases involve the exchange of sensitive information including, but not limited to, medical records, records relating to incarceration, records relating to discipline of police officers, records relating to police investigations, and so on.

4. This case is expected to be no different.

5. On October 14, 2024, Plaintiff reached out to Defendants to propose that the parties in this case adopt the confidentiality order recently entered, after contested briefing, by this Court in *Martinez v. Guevara et al.*, No. 23-cv-1741 (N.D. Ill.).

6. Defendants agreed to that proposal.

7. A court “may, for good cause, issue an order to protect a party or person from annoyance, embarrassment, oppression, or undue burden and expense.” Fed. R. Civ. P. 26(c). The Court has “broad discretion” to decide “when a protective order is appropriate and what degree of protection is required.” *Prince v. Kato*, No. 18 C 2952, 2019 WL 3554533, at *1 (N.D. Ill. July 30, 2019). The party seeking protection “bears the burden of presenting a particular and specific demonstration of fact as to the need for that protection.” *City of Rockford v. Mallinckrodt ARD, Inc.*, Nos. 17 C 50107, 20 C 50056, 2020 WL 1675593, at *2 (N.D. Ill. Apr. 6, 2020) (internal quotations omitted). “To determine whether a party has shown good cause for the requested protective order, the district court must balance the parties’ interests, taking into account the importance of disclosure to the nonmovant and the potential harm to the party seeking the protective order.” *Prince*, 2019 WL 3554533, at *2.

8. This standard is well satisfied with respect to the documents usually exchanged in cases like this. *E.g.*, *Martinez v. Guevara et al.*, No. 23-cv-1741, Order, ECF No. 154 (N.D. Ill. April 15, 2024).

9. There is also good cause to enter the proposed order because the parties all agree to it and because it varies only slightly from the Court’s model order.

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For all these reasons, Plaintiff requests that the Court enter the proposed confidentiality and protective order submitted herewith.

Dated: October 28, 2024

Respectfully submitted,

/s/ Thomas R. Kayes

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